



Association  
of Electric  
Cooperatives

Virginia, Maryland & Delaware

Postal Regulatory Commission  
Submitted 1/23/2020 4:43:33 PM  
Filing ID: 111973  
Accepted 1/24/2020  
Samuel R. Brumberg  
ASSOCIATION COUNSEL

Publishers of COOPERATIVE LIVING

**VIA ELECTRONIC FILING**

*January 23, 2020*

Postal Regulatory Commission  
Washington, D.C. 20268-0001

**Re: Docket No. RM2017-3  
Reintroduction of Rate Increase Proposals through 2025**

Dear Commissioners:

The Virginia, Maryland and Delaware Association of Electric Cooperatives ("Association") is a public interest trade association serving the interests of the member-owners and rural residents of Virginia, Maryland, and Delaware. Electric cooperative member-owners are 1.5 million citizens across the mid-Atlantic region. **The Association publishes an award-winning magazine, *Cooperative Living*, and this publication is a crucial source of information not only on news across the region, but also regarding electric utility service. The magazine is the most widely read print publication across the mid-Atlantic.**

The Association joins the Alliance of Nonprofit Mailers in urging you to reconsider your proposal to increase postage rates by a total of up to 40 percent or more over the next five years. The complicated formulas added will also disproportionately impact nonprofit mailers if mail volume drops further. The proposal to increase postage costs will not reform the United States Postal Service and will have a severe impact on the Association's members. **As costs for the Association increase, costs for our electric cooperative members increase, and in turn electric rates will rise.**

As not-for-profit, consumer-owned and consumer-governed organizations, electric cooperatives utilize mail for many reasons, including distributing our magazine to member-consumers. Those mailings provide members with critical information about their cooperatives, including their cooperatives' financial condition, how they can participate in electing cooperative directors to represent them on the cooperatives' boards of directors, **electric rate change information as ordered by regulatory authorities**, and how they can participate in cooperative meetings. Those mailings also include information that can help consumers use energy more wisely, participate in cooperative energy management programs, and otherwise save money on their electric service. And, because cooperatives are not-for-profit and consumer-owned, cooperatives will be forced to pass on to those member-consumers the full cost of any postage rate increases. A 40%+ increase would have a drastic impact on their mission and their members. Finally, we would associate ourselves with the comments of our national trade association, the National Rural Electric Cooperative Association ("NRECA").

We would look forward to working with you to find alternatives to this proposal. Please do not hesitate to be in touch with me or the staff of NRECA.

Very truly yours,

Samuel R. Brumberg